

## Jackson Law Croup, P.C.

Filed 04/15/2007

Raymond L. Jackson, Jr. (AL & GA) Scott R. Crouse Brian D. Mann, of Counsel

Exhibit G – 3/30/2007 letter by Defendants' counsel regarding document requests

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Page Chiefe 3t., Suite D

March 30, 2007

C. Nelson Gill, Esq. Copeland, Franco, Screws & Gill, P.A. P.O. Box 347 Montgomery, AL 36101-0347

Re: U.S. Beverage, Inc. & GBD Holding, LLC

Dear Nelson:

I have discussed your clients' settlement offer with my client John Walker. Mr. Walker declines your settlement offer. In my opinion the parties are too far apart to discuss settlement at this time. Although my client would be glad to transfer his shares of stock in the corporation and limited liability company for a fair price, my client does not intend to surrender his shares of those companies for no value as you insist in your settlement offer as well as in your letters regarding mediation from December of last year. My client also does not intend to write off the approximately \$62,000.00 that your clients have owed him since July of 2005. Any settlement offer that does not include the payment to my client of the monies owed to him by U.S. Beverage as well as fair value for his shares will not be accepted. It is apparent to me that this case will most likely be decided by a jury sometime in the future. We look forward to seeing you in Court for the preliminary injunction hearing on April 23<sup>rd</sup>.

Your clients' excuses about not producing documents that have been requested by me for over four months are not acceptable. If your clients will not produce all of the documents that have been promised during the depositions and/or provide written certification that they have thoroughly searched their records and that certain documents do not exist, I will be forced to file a motion to compel the production of documents prior to our preliminary injunction hearing. We have produced approximately 1,000 pages of documents to your clients in this case. You even used my client's compliance with your document requests as "alleged" evidence of misconduct in your recent brief. Since your clients are now claiming over one million dollars in damages, they can afford to spend the time and resources necessary to produce the requested documents. For your benefit, I have also enclosed my clients' supplemental Rule 26 disclosures.

For scheduling purposes, I also wanted to mention now the depositions that I anticipate taking after the preliminary injunction. Because you have alleged collusion between my client and Supreme Manufacturing Company, I have listed Cliff Kraus and Gary Dukes from that company as potential witnesses. After our preliminary injunction hearing, I intend to notice

depositions of Cliff Kraus in New Jersey and Gary Dukes in Florida. We will need to schedule time in June to travel to New Jersey and Florida for these depositions. Since your clients' are claiming such large amounts of damages in Mississippi and Arkansas (after not being able to identify in their depositions any lost business in those states), I also intend to take depositions in Mississippi and Arkansas of all of the U.S. Beverage customers who allegedly have been taken by my client or who were allegedly interfered with by my client. Please let me know when you are available to set the depositions for Mississippi and Arkansas, also. We should probably set a week aside to travel to Mississippi and Arkansas during July or August. I also intend to depose your clients again, because we agreed that the initial depositions were for preliminary injunction purposes only. I will probably want to schedule these depositions for sometime in July. You are welcome to depose Mr. Walker again. Lastly, I may decide to depose one or more people from Dispensing Systems in Atlanta, Georgia.

Thank you in advance for your cooperation. If you have any questions, you can call me at (334) 821-0600.

Sincerely,

Raymond L. Jackson, Jr.

cc: Mr. John B. Walker

## JACKSON LAW GROUP, P.C.

FACSIMILE TRANSMITTAL SHEET	
TO: C. Nelson Gill, Esq.	FROM: Raymond Jackson
COMPANY:	
Copeland, Franco, Screws & Gill	MARCH 30, 2007
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
334-834-3172	5
PHONE NUMBER:	SENDER'S REFERENCE NUMBER;
RE: U.S. Beverage, Inc. &	YOUR REFERENCE NUMBER:
$\square$ urgent $X$ for review [	☐ PLEASE COMMENT ☐ PLEASE REPLY

**COMMENTS:** Please see the attached correspondence and supplemental Rule 26 disclosures.

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